From: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1@navy.mil]
Sent: Wednesday, July 1, 2020 4:24 PM
To: Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA) [kimberly.ostrowski@navy.mil]; Lansdale, Lawrence L CIV USN (USA) [lawrence.lansdale@navy.mil]
CC: Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) [thomas.macchiarella@navy.mil]; Wochnick, Heather M CIV USN (US) [heather.wochnick@navy.mil]; Stoick, Paul T CIV USN (USA) [paul.stoick@navy.mil]; Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) [elizabeth.roddy@navy.mil]
Subject: Fw: Discussion on EPA GC#30 and #34 [Meeting Summary and Next Steps]
Attachments: Follow Up Response to Comments on the Appendix E July 1 2020.docx

Kim/LLL, See comments responses below. For full detailed responses, please see the attached.

EPA Comment #2 - For the last year, EPA has raised the mismatch between comparing monitoring datacollected at the site perimeter to worker standards, when the perimetermonitors are closest to the public and may be needed to evaluate exceedancesrecorded by real-time monitors. In particular, using the CalOSHA PM10 level of5,000 ug/m3 versus the daily state standard (and DTSC HERO PM10 action level)of 50 ug/m3 and the 150 ug/m3 Federal NAAQS is of concern. EPA requests theNavy compare perimeter PM10 data to the daily state and federal PM10 standards,in addition to the 5,000 ug/m3 CalOSHA level. This will benefit the Navy andEPA by establishing longer duration benchmarks, consistent with establishedpublic heath-based standards, to compare with then short-term exceedances ofthe DTSC HERO PM10 action levels. This will also inform the Navy, EPA, DTSC,and the public on the effectiveness of mitigation measures to controlexceedances over durations consistent with established particulate standards.

Response: This comment has been raised and resolved multiple times. The text from the prior RTCs and text changes follow, "The Navy will compare real-time perimeter dust monitoring data to the Bay Area Air Quality Management District (BAAQMD) regulatorylimit for total PM10 of 50 $\mu g/m^3$. The dust monitors will be placed adjacent to the fenceline in the northeast and northwestcorners of the site. " This is the most strict standard we have

3. During the 6/23 Soil Sorter S3 presentation,Navy contractors described how non-diverted soil would be immediately returnedand stockpiled at the trench unit it came from. This is new information. Whilethis process will address some stockpile management issues, it presents a dustcontrol and air monitoring challenge. EPA requests that the Navy addinformation to Appendix E regarding how dust will be controlled at thesemultiple stockpiles and how PM10 monitors will be sited to detect emissionsfrom them. More real-time PM10 monitors may need to be deployed depending onthe locations of the stockpiles.

Response: This issue has been addressed multiple times in RTCs and text changes. The Navy's dust management program will adjust to site conditions and the changing work locations.

4. The RTC for EPA comment #5 states the thatfollowing language has been added: “Air quality sampling equipment is setupapproximately 15 to 30 minutes before field work is scheduled to begin. Noearthmoving work will start until the sampling equipment is running. Theequipment is turned off

when earthmoving activities cease."(emphasis added)Given the multiple soil stockpiles planned as described in #3, EPA is concernedthat the Navy is proposing that real-time dust monitoring will only beconducted when earthmoving activities are happening. EPA requests that the Navyupdate the plan to clarify that real-time dust monitoring will be set up beforefield work is scheduled to begin, but that the monitors will remain on duringthe entire workday, while the stockpiles remain and workers are on site atParcel G, regardless of earthmoving activities. EPA also requests that the Navyclarify that perimeter air monitors will remain on during the entire workdayand overnight (i.e., for at least 104 hours), while stockpiles remain,regardless of earthmoving activities.

Response:

Theresponse and the DMP text were revised per the EPA's comment.

Thefollowing sentence was added to Section 3.2, first paragraph:
"Air quality sampling equipmentis setup approximately 15 to 30 minutes before field work is scheduled tobegin. No earthmoving work will start until the sampling equipment is running.Air monitoring will continue while stockpiles remain and workers are onsite atParcel G."

From: Clancy, Maeve <Clancy.Maeve@epa.gov>
Sent: Friday, June 26, 2020 12:25 PM
To: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.roddy@navy.mil>
Cc: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil>; Stoick, Paul T CIV USN (USA) <paul.stoick@navy.mil>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil>; Arlauskas, Joseph CIV USN NAVFAC SW SAN CA (USA) <joseph.arlauskas@navy.mil>; Slabbekorn, Ray B CIV (USA) <ray.b.slabbekorn@navy.mil>; Norman, Marvin D CIV USN NAVFAC SW SAN CA (USA) <marvin.norman@navy.mil>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Kappelman, David <Kappelman.David@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Bercik, Lisa M. <lisa.bercik@aptim.com>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>; Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>; Chesnutt, John <Chesnutt.John@epa.gov>; Plate, Mathew <Plate.Mathew@epa.gov>
Subject: [Non-DoD Source] RE: Discussion on EPA GC#30 and #34 [Meeting Summary and Next Steps]
Importance: High

Hi Liz,

We appreciate the Navy's continued focus on incorporating our comments on the Parcel G Workplan Addendum and have conducted an expedited review of the RTCs and can provide feedback. John Chesnutt had hoped to talk to Thomas Macchiarella today, but he told John that he is out of the office and that we should send our update to you, and they will talk on Monday.

While a lot of progress has been made, we unfortunately still have a few major concerns that we expect the Navy to address in the final Addendum:

1. Some of the RTCs state that parts of Appendix E have been updated, but don't provide details about the updates. For other RTCs, it appears that important

information in the RTC table has not been added to Appendix E, but this is also unclear. We were disappointed to learn the Navy would not honor our previous request for a redline version. During our mangers meeting on 6/23 we reminded the Navy that we would need to request a redline version if the RTCs were not clear, so we requesting that now. We may have additional comments on the RTCs after review of the redline version.

2. For the last year, EPA has raised the mismatch between comparing monitoring data collected at the site perimeter to worker standards, when the perimeter monitors are closest to the public and may be needed to evaluate exceedances recorded by real-time monitors. In particular, using the CalOSHA PM10 level of 5,000 ug/m3 versus the daily state standard (and DTSC HERO PM10 action level) of 50 ug/m3 and the 150 ug/m3 Federal NAAQS is of concern. EPA requests the Navy compare perimeter PM10 data to the daily state and federal PM10 standards, in addition to the 5,000 ug/m3 CalOSHA level. This will benefit the Navy and EPA by establishing longer duration benchmarks, consistent with established public heath-based standards, to compare with then short-term exceedances of the DTSC HERO PM10 action levels. This will also inform the Navy, EPA, DTSC, and the public on the effectiveness of mitigation measures to control exceedances over durations consistent with established particulate standards.

3. During the 6/23 Soil Sorter S3 presentation, Navy contractors described how non-diverted soil would be immediately returned and stockpiled at the trench unit it came from. This is new information. While this process will address some stockpile management issues, it presents a dust control and air monitoring challenge. EPA requests that the Navy add information to Appendix E regarding how dust will be controlled at these multiple stockpiles and how PM10 monitors will be sited to detect emissions from them. More real-time PM10 monitors may need to be deployed depending on the locations of the stockpiles.

4. The RTC for EPA comment #5 states the that following language has been added: “Air quality sampling equipment is setup approximately 15 to 30 minutes before field work is scheduled to begin. No earthmoving work will start until the sampling equipment is running. The equipment is turned off when earthmoving activities cease.”(emphasis added) Given the multiple soil stockpiles planned as described in #3, EPA is concerned that the Navy is proposing that real-time dust monitoring will only be conducted when earthmoving activities are happening. EPA requests that the Navy update the plan to clarify that real-time dust monitoring will be set up before field work is scheduled to begin, but that the monitors will remain on during the entire workday, while the stockpiles remain and workers are on site at Parcel G, regardless of earthmoving activities. EPA also requests that the Navy clarify that perimeter air monitors will remain on during the entire workday and overnight (i.e., for at least 104 hours), while stockpiles remain, regardless of earthmoving activities.

Again, we appreciate the Navy’s work in updating Appendix E and we look forward to reviewing a final version that is acceptable to EPA. Please note that we expect that all Appendix E RTCs will be included in the Addendum.

If you’d like to give me a call to discuss these today, please call my cell phone at (b) (6) as R9’s phone service is still down. I have a 1pm meeting but will be available any time after 2pm.

Thanks!

Maeve Clancy
EPA Region 9
Remedial Project Manager
Superfund and Emergency Management Division
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From: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.roddy@navy.mil>
Sent: Wednesday, June 24, 2020 12:55 PM
To: Clancy, Maeve <Clancy.Maeve@epa.gov>
Cc: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil>; Stoick, Paul T CIV USN (USA) <paul.stoick@navy.mil>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil>; Arlauskas, Joseph CIV USN NAVFAC SW SAN CA (USA) <joseph.arlauskas@navy.mil>; Slabbekorn, Ray B CIV (USA) <ray.b.slabbekorn@navy.mil>; Norman, Marvin D CIV USN NAVFAC SW SAN CA (USA) <marvin.norman@navy.mil>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Kappelman, David <Kappelman.David@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Bercik, Lisa M. <lisa.bercik@aptim.com>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>; Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>; Chesnutt, John

<Chesnutt.John@epa.gov>; Plate, Mathew <Plate.Mathew@epa.gov>
Subject: RE: Discussion on EPA GC#30 and #34 [Meeting Summary and Next Steps]

Good Afternoon Maeve,

Thank you for your review of the Dust Management and Air Monitoring Plan Revision 01, including the Crosswalk provided in Attachment 1, as well as, participating in the conference call to address clarification of a few comments on June 16th, 2020. We have reviewed the comments submitted on May 22nd, 2020 and are providing the response to comments attached, incorporating the discussion between the Navy and EPA. In order to maintain project schedule, the Navy will send the Final Dust Management and Air Monitoring Plan (Appendix E) on July 1st, 2020 via change pages for Appendix E for the Final Parcel G Work Plan Addendum.

Very Respectfully,

Liz Roddy
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From: Clancy, Maeve <Clancy.Maeve@epa.gov<mailto:Clancy.Maeve@epa.gov>>
Sent: Friday, May 22, 2020 11:58 AM
To: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.roddy@navy.mil<mailto:elizabeth.roddy@navy.mil>>
Cc: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil<mailto:derek.j.robinson1@navy.mil>>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil<mailto:thomas.macchiarella@navy.mil>>; Stoick, Paul T CIV USN (USA) <paul.stoick@navy.mil<mailto:paul.stoick@navy.mil>>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil<mailto:matthew.liscio@navy.mil>>; Arlauskas, Joseph CIV USN NAVFAC SW SAN CA (USA) <joseph.arlauskas@navy.mil<mailto:joseph.arlauskas@navy.mil>>; Slabbekorn, Ray B CIV (USA) <ray.b.slabbekorn@navy.mil<mailto:ray.b.slabbekorn@navy.mil>>; Norman, Marvin D CIV USN NAVFAC SW SAN CA (USA) <marvin.norman@navy.mil<mailto:marvin.norman@navy.mil>>; Praskins, Wayne <Praskins.Wayne@epa.gov<mailto:Praskins.Wayne@epa.gov>>; Kappelman, David <Kappelman.David@epa.gov<mailto:Kappelman.David@epa.gov>>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov<mailto:Sanchez.Yolanda@epa.gov>>; Bercik, Lisa M. <lisa.bercik@aptim.com<mailto:lisa.bercik@aptim.com>>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov<mailto:Fairbanks.Brianna@epa.gov>>; Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com<mailto:Karla.Brasaemle@TechLawInc.com>>; Chesnutt, John <Chesnutt.John@epa.gov<mailto:Chesnutt.John@epa.gov>>; Plate, Mathew <Plate.Mathew@epa.gov<mailto:Plate.Mathew@epa.gov>>
Subject: [Non-DoD Source] RE: Discussion on EPA GC#30 and #34 [Meeting Summary and Next Steps]
Importance: High

Dear Liz,

Please see the attached the EPA comments on the Appendix E, Parcel G Dust Management and Air Monitoring Plan dated May 1, 2020, and supplemental radiological monitoring information emailed on May 12, 2020. I know that you are out of the office today. As requested, I am copying all Navy personnel who have been involved with this.

All comments are contained in the attached PDF, but I have included a MS Word version of Dave Kappleman's comments on the supplemental radiological monitoring information (#19-#21) for clarity.

We appreciate all of the Navy's work on Appendix E. It was greatly improved by: updating Table 2 with the unadjusted NESHAP levels, adding the QA crosswalk and new tables, and including multiple technical attachments. The Navy also included new responsive information and removed inconsistencies. However, there are still some fundamental issues with how the Navy is proposing to monitor and how decisions will be made based on the monitoring data. We have also identified technical issues which were only apparent with the additional details provided.

We are committed to working through these issues with the Navy. We are available to answer any questions and would be happy to have a call to discuss these comments at your earliest convenience.

Thanks.

Maeve Clancy
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From: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.roddy@navy.mil<mailto:elizabeth.roddy@navy.mil>>
Sent: Friday, May 1, 2020 1:53 PM
To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil<mailto:derek.j.robinson1@navy.mil>>; Clancy, Maeve <Clancy.Maeve@epa.gov<mailto:Clancy.Maeve@epa.gov>>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil<mailto:thomas.macchiarella@navy.mil>>; Stoick, Paul T CIV USN (USA) <paul.stoick@navy.mil<mailto:paul.stoick@navy.mil>>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil<mailto:matthew.liscio@navy.mil>>; Arlauskas, Joseph CIV USN NAVFAC SW SAN CA (USA) <joseph.arlauskas@navy.mil<mailto:joseph.arlauskas@navy.mil>>; Slabbekorn, Ray B CIV (USA) <ray.b.slabbekorn@navy.mil<mailto:ray.b.slabbekorn@navy.mil>>; Norman, Marvin D CIV USN NAVFAC SW SAN CA (USA) <marvin.norman@navy.mil<mailto:marvin.norman@navy.mil>>; Praskins, Wayne <Praskins.Wayne@epa.gov<mailto:Praskins.Wayne@epa.gov>>; Kappelman, David <Kappelman.David@epa.gov<mailto:Kappelman.David@epa.gov>>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov<mailto:Sanchez.Yolanda@epa.gov>>; Bercik, Lisa M. <lisa.bercik@aptim.com<mailto:lisa.bercik@aptim.com>>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov<mailto:Fairbanks.Brianna@epa.gov>>; Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com<mailto:Karla.Brasaemle@TechLawInc.com>>; Chesnutt, John <Chesnutt.John@epa.gov<mailto:Chesnutt.John@epa.gov>>; Plate, Mathew <Plate.Mathew@epa.gov<mailto:Plate.Mathew@epa.gov>>; Bohning, Scott <Bohning.Scott@epa.gov<mailto:Bohning.Scott@epa.gov>>
Subject: RE: Discussion on EPA GC#30 and #34 [Meeting Summary and Next Steps]

Hello Everyone,

Attached you will find the crosswalk between the UFP QAPP/SAP and the work plan (Attachment 1) and the updated table of unadjusted NESHAP levels (Table 2). Additionally, updates were made to the Appendix E, Parcel G Dust Management and Air Monitoring Plan to provide additional details on sampling procedures and instrumentation. The majority of this additional information can be found in Section 3, Tables 1 through 5, and Attachments 1, 2, and 3 of the attached Revision 01 Dust Management and Air Monitoring Plan for Parcel G.

Very Respectfully,

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From: Clancy, Maeve <Clancy.Maeve@epa.gov<mailto:Clancy.Maeve@epa.gov>>
Sent: Wednesday, April 01, 2020 6:03 PM
To: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.roddy@navy.mil<mailto:elizabeth.roddy@navy.mil>>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil<mailto:derek.j.robinson1@navy.mil>>; Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA) <thomas.macchiarella@navy.mil<mailto:thomas.macchiarella@navy.mil>>; Stoick, Paul T CIV USN (USA) <paul.stoick@navy.mil<mailto:paul.stoick@navy.mil>>; Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA) <matthew.liscio@navy.mil<mailto:matthew.liscio@navy.mil>>; Arlauskas, Joseph CIV USN NAVFAC SW SAN CA (USA) <joseph.arlauskas@navy.mil<mailto:joseph.arlauskas@navy.mil>>; Slabbekorn, Ray B CIV (USA) <ray.b.slabbekorn@navy.mil<mailto:ray.b.slabbekorn@navy.mil>>; Norman, Marvin D CIV USN NAVFAC SW SAN CA (USA) <marvin.norman@navy.mil<mailto:marvin.norman@navy.mil>>; Praskins, Wayne <Praskins.Wayne@epa.gov<mailto:Praskins.Wayne@epa.gov>>; Kappelman, David <Kappelman.David@epa.gov<mailto:Kappelman.David@epa.gov>>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov<mailto:Sanchez.Yolanda@epa.gov>>; Bercik, Lisa M. <lisa.bercik@aptim.com<mailto:lisa.bercik@aptim.com>>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov<mailto:Fairbanks.Brianna@epa.gov>>; Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com<mailto:Karla.Brasaemle@TechLawInc.com>>; Chesnutt, John <Chesnutt.John@epa.gov<mailto:Chesnutt.John@epa.gov>>; Plate, Mathew <Plate.Mathew@epa.gov<mailto:Plate.Mathew@epa.gov>>; Bohning, Scott <Bohning.Scott@epa.gov<mailto:Bohning.Scott@epa.gov>>
Subject: [Non-DoD Source] RE: Discussion on EPA GC#30 and #34 [Meeting Summary and Next Steps]

Hi Everyone,

Thank you for being available for our call yesterday. EPA appreciates the productive discussion that we had. Below is a high level summary that we prepared based on our meeting goals. It includes what we see as the next steps in resolving these issues.

Please note that we have provided a list of missing QA elements and examples below to fulfill next step #1a. below.

Please contact me with any questions, concerns, or comments. Thank you!

Meeting Summary and Next Steps
3/31 Discussion on EPA GC#30 and #34 Parcel G Workplan Addendum

(1) To come to an agreement on the need for a SAP or QAPP that includes the air quality data collection.

- There was a long conversation regarding the policies around QAPP/SAPs for the Navy and EPA. The Navy mentioned the air monitoring data was considered “secondary” data or ancillary work and would be treated differently under its QA program. EPA stated that EPA’s QA policy is clear that any environmental measurement requires a QAPP or equivalent documentation.

- EPA noted that adding a SAP/QAPP to the addendum will bring transparency and clarity to both regulatory agencies who do oversight and contractors who do implementation. EPA suggested all the important aspects of quality assurance should be in one place in an accessible format, because this systematic layout of information is easier for contractors to implement and for the Navy to replicate throughout the site moving forward. EPA noted expected elements of an air monitoring program are just missing (even though those elements are included for the soil data), so it's not just a format issue.

- There was a discussion regarding how adding this to this project might impact other projects at the site (or even within the entire BRAC program), in addition to adding 7-12 months to the process.

- The Navy reiterated a desire to have a list of missing elements.

- The Navy QAO seemed open to reviewing the workplan and providing a crosswalk between it and the Uniform Federal Policy for Quality Assurance Project Plans (UFP QAPP).

Next Steps:
a) EPA will provide a list of missing elements.

Here is EPA's general list: the plan is missing specifics on methodology, procedures, field and laboratory quality control (including on-site and off-site labs), monitor siting, analytical corrective action, custody, data review and validation, and quality objectives. This is not meant to be an exhaustive list, but a starting point for the Navy to focus their review.

Some specific examples include, but are not limited to:

· The Navy needs to identify how the objectives of the monitoring strategy informed action levels, method selection, and how monitoring locations were selected.

· The Navy needs to identify the mechanics of how laboratory and radionuclide data will inform project activities and actions. Will some or all samples sent to laboratories be expedited? How will laboratory/radionuclide data be used in conjunction with real-time analyses to inform real-time action levels?

· The Navy needs to identify the specific equipment used and provide equipment-specific procedures. Where guidance and methods are referenced, the Navy needs to ensure that these are up to date, consistent with the monitoring objectives, and compatible.

· The Navy needs to provide a map of where the soil sorter (and potential RSY pads) will be located in relation to the monitors/samplers.

· The Navy needs to provide specific procedures/forms for checking real-time monitors.

· The Navy needs to clearly describe the procedures for counting filters for the radiological monitoring.

· The Navy needs to define quantitative control limits for calibrations, accuracy/bias, precision, and completeness for each field and laboratory method selected.

· The Navy needs to provide more information regarding equipment sensitivity to determine if action levels are exceeded.

b) Navy will crosswalk UFP QAPP with workplan and provide to EPA. EPA believes this crosswalk, along with looking more closely at the items identified above, will help the Navy identify deficiencies.
c) Navy/EPA will schedule a meeting with QA staff and contractors to discuss the crosswalk and responses to EPA's list.

(2) To come to an agreement on how the Navy will demonstrate compliance with the NESHAPs ARAR for the radiological air monitoring action levels.

- There was a conversation on where the point-of-compliance is for the NESHAP ARAR. The discussion identified three possible points of compliance: the source, the fence-line, or the receptor. The discussion also considered whether the NESHAP measured at the source could be modified to demonstrate compliance at the receptor.

- EPA clarified the NESHAP as an ARAR should be implemented at the perimeter without adjustments.

- There was a discussion on whether the field instruments could meet this requirement to measure each radionuclide at the 10 mrem/year effective dose. The Navy mentioned they would measure for worker levels and only send to an outside lab if there was an exceedance.

Next Steps:

a) Navy to redevelop Table 2 with unadjusted NESHAP levels of 10 mrem/year.

b) Navy to discuss with their contractors issues with implementation in regards to the monitoring instruments (to meet radiological NESHAP levels of 10 mrem/year effective dose).

(3) Discuss how changes to the Final Parcel G Workplan addendum will be made. Not discussed.

(4) Discuss how these changes to will be incorporated into the subsequent Removal Site Evaluation Workplans. Not discussed.

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-----Original Appointment-----

From: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA) <elizabeth.roddy@navy.mil<mailto:elizabeth.roddy@navy.mil>>

Sent: Wednesday, March 25, 2020 4:49 PM

To: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA); Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA); Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (US); Stoick, Paul T CIV USN (USA); Liscio, Matthew P CIV USN NAVSEA DET RASO VA (USA); Arlauskas, Joseph CIV USN NAVFAC SW SAN CA (USA); Slabbekorn, Ray B CIV (USA); Norman, Marvin D CIV USN NAVFAC SW SAN CA (USA); Clancy, Maeve; Praskins, Wayne; Kappelman, David; Sanchez, Yolanda; Bercik, Lisa M.; Fairbanks, Brianna; Brasaemle, Karla; Chesnutt, John; Plate, Mathew; Bohning, Scott

Subject: Discussion on EPA GC#30 and #34

When: Tuesday, March 31, 2020 11:00 AM-12:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Dial In: (b) (6)

Hello,

Please join me to discuss EPA's General Comment #30 and General Comment #34 on the Final Parcel G WPA. Our goal is to discuss the legal proceedings surrounding the NESHAP requirements addressed in GC #34. As well as, discuss EPA's request for all non-radiological and radiological air monitoring procedures be included in a SAP for GC #30.

Please forward to those on your technical team I may have missed.

Very Respectfully,

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** Please Note: Due to COVID-19 health concerns, I will be teleworking until further notice. Please understand, while my desk phone is forwarded, it does not display caller ID. If you are unsuccessful at reaching me via telephone, please send me an email requesting a call and I will respond as soon as possible. Thank you for your patience and understanding during this time. **

Follow Up Response to Comments on the *Appendix E, Final, Revision 1, Dust Management and Air Monitoring Plan, Radiological Investigation, Survey, and Reporting Parcel G, Former Hunters Point Naval Shipyard, San Francisco, California,* May 2020, DCN: APTM-0006-5065-0005.A1/F.R1	
Comments by: Maeve Clancy, Regional Project Manager, EPA, comments dated June 26, 2020	
EPA Follow Up Comments	Responses
2. For the last year, EPA has raised the mismatch between comparing monitoring data collected at the site perimeter to worker standards, when the perimeter monitors are closest to the public and may be needed to evaluate exceedances recorded by real-time monitors. In particular, using the CalOSHA PM10 level of 5,000 ug/m3 versus the daily state standard (and DTSC HERO PM10 action level) of 50 ug/m3 and the 150 ug/m3 Federal NAAQS is of concern. EPA requests the Navy compare perimeter PM10 data to the daily state and federal PM10 standards, in addition to the 5,000 ug/m3 CalOSHA level. This will benefit the Navy and EPA by establishing longer duration benchmarks, consistent with established public heath-based standards, to compare with then short-term exceedances of the DTSC HERO PM10 action levels. This will also inform the Navy, EPA, DTSC, and the public on the effectiveness of mitigation measures to control exceedances over durations consistent with established particulate standards.	The Navy will compare real-time perimeter dust monitoring data to the Bay Area Air Quality Management District (BAAQMD) regulatory limit for total PM10 of 50 µg/m^3. The dust monitors will be placed adjacent to the fenceline in the northeast and northwest corners of the site, closest to residents as requested by California Department of Toxic Substances Control (DTSC), as shown on Figure 1. Dust monitoring and comparison to the BAAQMD regulatory limit will be performed for the entirety of the project. The Navy will also continue to use the Cal OSHA PEL limit for PM10 as established in the *Final Basewide Dust Control Plan, Revision 1, Hunters Point Shipyard, San Francisco, California* (Tetra Tech EC, Inc, 2010). In a meeting between the Navy RPM and the EPA on June 16, 2020, the EPA requested the Navy verify the PEL was correct. The Navy verified the Cal OSHA PEL for particulates not otherwise regulated, respirable fraction is 5 mg/m^3 or 5,000 µg/m^3. Previous comments from the EPA on this topic have been addressed in the following responses included in Appendix A to the Parcel G WPA: • EPA General Comment 27, dated June 28, 2019 • EPA General Comment 34, dated June 28, 2019 • DTSC General Comment #3, dated May 30, 2019 The responses to the EPA comments included the following explanation: "To address concerns regarding potential contaminated dust to any nearby residents and visitors during the Parcel G rework project, the California DTSC Human and Ecological Risk Office (HERO) calculated acute, subchronic, and chronic dust action levels as particulate matter 10 micrometers or less in diameter (PM10) for community air monitoring (DTSC, 2019). HERO calculated the dust action levels using the

	maximum detected soil concentrations for arsenic, benzo(a)pyrene, chromium VI (particulates), cobalt and manganese at Parcel G. The calculated action levels ranged from 81 to 260,000 micrograms per cubic meter ($\mu g/m^3$), depending on the contaminant of concern. All calculated dust action levels were greater than the Bay Area Air Quality Management District (BAAQMD) regulatory limit for total PM10 of 50 $\mu g/m^3$. Therefore, compliance with the BAAQMD regulatory limit 50 $\mu g/m^3$ for total PM10 is protective for all chemicals found in soil at Parcel G. The Dust Management and Air Monitoring Plan was revised throughout to include real-time dust monitoring and a dust action level of 50 $\mu g/m^3$. Dust monitoring stations will be placed in the northeast and northwest corners of the site, closest to residents, as shown on the revised Figure 1." Stockpiles are common in environmental work, including radiological environmental work where soil sample analyses have a minimum of 21-day turn around times. It is common practice to stage material onsite pending approval for reuse as backfill or offsite disposal. Management of stockpiles is addressed in the Stormwater Management Plan (Appendix D) and the Dust Management and Air Monitoring Plan (Appendix E). The current air and dust monitoring locations are placed to monitor fugitive dust from the site regardless of stockpile location. The dust and air action levels are not corrected for dispersion or wind direction; therefore, the action levels are appropriate for stockpiles placed along the fence line as well as in the middle of Parcel G. The EPA has previously raised questions during discussions and in written comments about where the stockpiles will be placed because there was concern there was enough space around the soil sorter or in Parcel G. The Navy responded has responded to these comments, which can be found in Appendix A of the Final Parcel G Work Plan Addedum. EPA comments, dated May 22, 2020, requested Figure 1 be updated to include planned locations of the soil sorter, soil stockpiles and potential RSY pads. The Navy's response states the soil sorter is shown on Figure 1 (S3 Location). Soil piles are not shown in Figure 1. Soil piles will be located within Parcel G, near the S3 during
3. During the 6/23 Soil Sorter S3 presentation, Navy contractors described how non-diverted soil would be immediately returned and stockpiled at the trench unit it came from. This is new information. While this process will address some stockpile management issues, it presents a dust control and air monitoring challenge. EPA requests that the Navy add information to Appendix E regarding how dust will be controlled at these multiple stockpiles and how PM10 monitors will be sited to detect emissions from them. More real-time PM10 monitors may need to be deployed depending on the locations of the stockpiles.	

	processing and adjacent to trenches following processing. Soil piles may be relocated as needed (as radiological data becomes available or as site conditions change and work progresses) and do not necessarily have permanent locations. RSY pads are not planned at this time and are not shown on the figure. Previous comments from the EPA on this topic have been addressed in the following responses included in Appendix A to the Parcel G WPA: • EPA General Comment 26, dated May 27, 2019 The response stated that Staging of soil is addressed in the Parent WP (CH2M Hill, Inc. 2019). Each batch will be staged in its own stockpile. Section 3.6.3.1, page 3-19 of the Parent WP (CH2M Hill, Inc. 2019) states "Soil stockpiles (ESUs or SFUs) consisting of either former TU fill material or trench sidewalls and bottom materials with a maximum size of 152 m^3 will be staged near the soil sorting system." Additionally, Section 3.6.3.1, page 3-21 of the Parent WP (CH2M Hill, Inc. 2019) states "Soil pending offsite analytical results may be staged in stockpiles smaller than 152 m^3, which would permit the re-evaluation of smaller soil volumes should elevated soil sample results be received from the offsite laboratory." • Evaluation of EPA General Comment 1, dated January 1, 2020 The response explained that APTIM will track all material from excavation, to radiological soil processing, and to staging while awaiting approval to reuse the material for backfill. The fulltime Field Engineer will track soil using truck tickets, logs, and a tracking Excel spreadsheet or equivalent. Stockpiles will be labeled in the field and a map will be maintained in the field log book. Stockpiles will be a maximum size of 200 cubic yards (cy). • EPA New Comment 1, dated January 10, 2020 In this comment, the EPA expressed concerns that there may not be enough space to site the soil sorter and soil stockpiles on Parcel G. If the soil sorter and soil stockpiles are not located on Parcel G it is unclear how the requirements of Appendix E will apply.

	The response stated that all Parcel G field work, including soil sorting and staging of soil piles, will be performed within the Parcel G boundaries. If this changes after mobilization, a field change request will be prepared and submitted to the Navy. Project work plan requirements apply to project work regardless of the parcel location on HPNS.
4. The RTC for EPA comment #5 states the that following language has been added: "Air quality sampling equipment is setup approximately 15 to 30 minutes before field work is scheduled to begin. No earthmoving work will start until the sampling equipment is running. The equipment is turned off when earthmoving activities cease."(emphasis added) Given the multiple soil stockpiles planned as described in #3, EPA is concerned that the Navy is proposing that real-time dust monitoring will only be conducted when earthmoving activities are happening. EPA requests that the Navy update the plan to clarify that real-time dust monitoring will be set up before field work is scheduled to begin, but that the monitors will remain on during the entire workday, while the stockpiles remain and workers are on site at Parcel G, regardless of earthmoving activities. EPA also requests that the Navy clarify that perimeter air monitors will remain on during the entire workday and overnight (i.e., for at least 104 hours), while stockpiles remain, regardless of earthmoving activities.	The response and the DMP text were revised per the EPA's comment. The following sentence was added to Section 3.2, first paragraph: "Air quality sampling equipment is setup approximately 15 to 30 minutes before field work is scheduled to begin. No earthmoving work will start until the sampling equipment is running. Air monitoring will continue while stockpiles remain and workers are onsite at Parcel G." Section 3.2.5, third paragraph clarifies perimeter air monitors will remain on for at least 104 hours.